

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

KENNETH JOHNSON,  
FRANCIS CLEMENT,  
BRANDON BANNICK,  
EVAN PERKINS, and  
JOHN STINSON,

Defendants.

CASE NO. 1:20-CR-238 JLT

[PROPOSED]  
VERDICT FORM

WE, THE JURY, FIND THE DEFENDANT, **KENNETH JOHNSON (aka “K”, aka “Kenwood”)**,  
AS FOLLOWS:

**1. AS TO COUNT ONE OF THE INDICTMENT:**

GUILTY

NOT GUILTY

☐☐

of Conspiracy to conduct or participate in the conduct of the affairs  
of an enterprise through a pattern of racketeering activity, in  
violation of Title 18, United States Code, Section 1962(d).

Only if you found the defendant guilty of Count One, please answer the following:

We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about October 4, 2020, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill A.R. with malice aforethought.

YES

NO

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We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about October 4, 2020, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill R.M. with malice aforethought.

YES

NO

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We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about January 24, 2016, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill B.L. with malice aforethought.

YES

NO

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**2. AS TO COUNT TWO OF THE INDICTMENT:**

GUILTY

NOT GUILTY

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of Murder in aid of racketeering (A.R.), in violation of Title 18, United States Code, Section 1959(a)(1).

**3. AS TO COUNT THREE OF THE INDICTMENT:**

GUILTY

NOT GUILTY

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of Murder in aid of racketeering (R.M.), in violation of Title 18, United States Code, Section 1959(a)(1).

WE, THE JURY, FIND THE DEFENDANT, **FRANCIS CLEMENT (aka "Frank")**, AS FOLLOWS:

1. AS TO COUNT ONE OF THE INDICTMENT:

GUILTY

NOT GUILTY

☐☐

of Conspiracy to conduct or participate in the conduct of the affairs of an enterprise through a pattern of racketeering activity, in violation of Title 18, United States Code, Section 1962(d).

Only if you found the defendant guilty of Count One, please answer the following:

We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about October 4, 2020, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill A.R. with malice aforethought.

YES

NO

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We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about October 4, 2020, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill R.M. with malice aforethought.

YES

NO

☐☐

We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about February 22, 2022, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill M.B. with malice aforethought.

YES

NO

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We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about March 8, 2022, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill R.E. with malice aforethought.

YES

NO

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We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about March 8, 2022, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill J.Y. with malice aforethought.

YES

NO

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We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about January 24, 2016, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill B.L. with malice aforethought.

YES

NO

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**2. AS TO COUNT TWO OF THE INDICTMENT:**

GUILTY

NOT GUILTY

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of Murder in aid of racketeering (A.R.), in violation of Title 18, United States Code, Section 1959(a)(1).

**3. AS TO COUNT THREE OF THE INDICTMENT:**

GUILTY

NOT GUILTY

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of Murder in aid of racketeering (R.M.), in violation of Title 18, United States Code, Section 1959(a)(1).

4. AS TO COUNT FOUR OF THE INDICTMENT:

GUILTY

NOT GUILTY

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of Murder in aid of racketeering (M.B.), in violation of Title 18,  
United States Code, Section 1959(a)(1).

5. AS TO COUNT FIVE OF THE INDICTMENT:

GUILTY

NOT GUILTY

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of Murder in aid of racketeering (R.E.), in violation of Title 18,  
United States Code, Section 1959(a)(1).

6. AS TO COUNT SIX OF THE INDICTMENT:

GUILTY

NOT GUILTY

☐☐

of Murder in aid of racketeering (J.Y.), in violation of Title 18,  
United States Code, Section 1959(a)(1).

WE, THE JURY, FIND THE DEFENDANT, **BRANDON BANNICK** (aka “Bam Bam”, aka “Bam”), AS FOLLOWS:

1. AS TO COUNT ONE OF THE INDICTMENT:

GUILTY

NOT GUILTY

☐☐

of Conspiracy to conduct or participate in the conduct of the affairs of an enterprise through a pattern of racketeering activity, in violation of Title 18, United States Code, Section 1962(d).

Only if you found the defendant guilty of Count One, please answer the following:

We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about October 4, 2020, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill A.R. with malice aforethought.

YES

NO

☐☐

We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about October 4, 2020, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill R.M. with malice aforethought.

YES

NO

☐☐

We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about March 8, 2022, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill R.E. with malice aforethought.

YES

NO

☐☐

We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about March 8, 2022, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill J.Y. with malice aforethought.

YES

NO

☐☐

**2. AS TO COUNT TWO OF THE INDICTMENT:**

GUILTY

NOT GUILTY

☐☐

of Murder in aid of racketeering (A.R.), in violation of Title 18, United States Code, Section 1959(a)(1).

**3. AS TO COUNT THREE OF THE INDICTMENT:**

GUILTY

NOT GUILTY

☐☐

of Murder in aid of racketeering (R.M.), in violation of Title 18, United States Code, Section 1959(a)(1).

**4. AS TO COUNT FIVE OF THE INDICTMENT:**

GUILTY

NOT GUILTY

☐☐

of Murder in aid of racketeering (R.E.), in violation of Title 18, United States Code, Section 1959(a)(1).

**5. AS TO COUNT SIX OF THE INDICTMENT:**

GUILTY

NOT GUILTY

☐☐

of Murder in aid of racketeering (J.Y.), in violation of Title 18, United States Code, Section 1959(a)(1).

WE, THE JURY, FIND THE DEFENDANT, **EVAN PERKINS (aka "Soldier")**, AS FOLLOWS:

**1. AS TO COUNT ONE OF THE INDICTMENT:**

GUILTY

NOT GUILTY

☐☐

of Conspiracy to conduct or participate in the conduct of the affairs of an enterprise through a pattern of racketeering activity, in violation of Title 18, United States Code, Section 1962(d).

Only if you found the defendant guilty of Count One, please answer the following:

We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about March 8, 2022, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill R.E. with malice aforethought.

YES

NO

☐☐

We, the jury, having found the defendant guilty of the offense charged in Count One, further unanimously find that as part of that offense, the defendant, on or about March 8, 2022, while aided and abetted by others, did unlawfully, willfully, and intentionally, and with deliberation and premeditation, kill J.Y. with malice aforethought.

YES

NO

☐☐

**2. AS TO COUNT FIVE OF THE INDICTMENT:**

GUILTY

NOT GUILTY

☐☐

of Murder in aid of racketeering (R.E.), in violation of Title 18, United States Code, Section 1959(a)(1).



3. AS TO COUNT SIX OF THE INDICTMENT:

GUILTY

NOT GUILTY

☐☐

of Murder in aid of racketeering (J.Y.), in violation of Title 18,  
United States Code, Section 1959(a)(1).

1 WE, THE JURY, FIND THE DEFENDANT, **JOHN STINSON (aka "Pops")**, AS FOLLOWS:

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3 **1. AS TO COUNT ONE OF THE INDICTMENT:**

4 GUILTY

NOT GUILTY

5 ☐

6

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of Conspiracy to conduct or participate in the conduct of the affairs  
of an enterprise through a pattern of racketeering activity, in  
violation of Title 18, United States Code, Section 1962(d).

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8 Only if you found the defendant guilty of Count One, please answer the following:

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10 We, the jury, having found the defendant guilty of the offense charged in Count One, further  
11 unanimously find that as part of that offense, the defendant, on or about March 1, 2020, continuing to on  
12 or about April 30, 2020, unlawfully, willfully, and intentionally conspired with others to kill R.H. with  
malice aforethought.

13 YES

NO

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17 We, the jury, having found the defendant guilty of the offense charged in Count One, further  
18 unanimously find that as part of that offense, the defendant, on or about October 1, 2022, continuing to  
on or about May 1, 2023, unlawfully, willfully, and intentionally conspired with others to kill A.C. with  
malice aforethought.

19 YES

NO

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